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POLICE CHIEF JIM MCDONNELL

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

LOS ANGELES PRESS CLUB,  
STATUS COUP,

Plaintiffs,

vs.

CITY OF LOS ANGELES, a municipal  
entity, JIM MCDONNELL, LAPD  
CHIEF, sued in his official capacity;  
Defendants.

CASE NO. 25-CV-05423 HDV-E

DECLARATION OF DEPUTY CHIEF T.  
SCOTT HARRELSON IN RESPONSE  
TO OSC RE COMPLIANCE WITH THE  
TRO AND EXHIBITS

**DECLARATION OF T. SCOTT HARRELSON**

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1 I, T. SCOTT HARRELSON, declare:

2 1. I am employed by the City of Los Angeles as a Deputy Chief with the Los  
3 Angeles Police Department (“LAPD”). I have been employed by LAPD since 1995. I  
4 understand that on August 18, 2025, the Court in the above-captioned matter issued an  
5 order to show cause regarding compliance with a Temporary Restraining Order (“TRO”)  
6 issued by the Court in the same matter on or about July 10, 2025. I further understand  
7 that the Court ordered “Defendants to show cause in writing, no later than August 22,  
8 2025, describing in detail all measures that the LAPD and its counsel have taken to  
9 disseminate the Court’s TRO and ensure compliance with its terms.” I submit this  
10 declaration in response to the Court’s order to show cause. If called to testify, I could  
11 and would competently do so of my own personal knowledge.

12 2. I have attended advanced training on the incident command system, and I  
13 have been the Incident Commander, or have participated in a leadership role, in over 40  
14 protests and/or demonstrations, including Dodgers and Lakers championship parades.

15 3. I am familiar with state laws and LAPD policies concerning crowd dispersal  
16 methods and interactions with the press during protests and demonstrations. Specifically,  
17 I understand that Penal Code section 13652 (A.B. 48) prohibits law enforcement from  
18 using “kinetic energy projectiles,” which include LLMs, “to disperse any assembly,  
19 protest, or demonstration.” I further understand that under Penal Code section 409.7  
20 (S.B. 98), a “duly authorized representative” of the press “may enter closed areas” during  
21 a “demonstration, march, protest, or rally.” These statutes became effective on January 1,  
22 2022. Accordingly, in order to inform LAPD employees of such enactments, the Office  
23 of the Chief of Police disseminated a notice to all department personnel on December 14,  
24 2021, entitled “Assembly Bill 48 – Use of Kinetic Energy Projectiles and Chemical  
25 Agents; and Senate Bill 98 – Media Access to Closed Areas – Assemblies, Protests or  
26 Demonstrations.” Attached as **Exhibit A** is a true and correct copy of this notice.  
27 Exhibit A recapitulates Penal Code sections 13652 and 409.7.



1 The Training Bulletin notes that although “[a]uthorized members of the media are  
2 allowed behind police lines[,]...the Department may restrict media access to the  
3 command post, or crime scenes for the purpose of the preservation of evidence.” The  
4 Training Bulletin further notes that “[n]othing precludes officers from enforcing other  
5 applicable laws if the member of the media is engaged in activity that is otherwise  
6 unlawful or is interfering with official law enforcement duties including, but not limited  
7 to, collecting evidence and making arrests.”

8 6. On Friday, July 11, 2025, Carlos De La Guerra, Managing Senior Assistant  
9 City Attorney of the Public Safety General Counsel Division of the City Attorney’s  
10 Office, learned about the Court’s TRO and emailed me a copy and discussed it with me.  
11 I understood that in order to comply with the TRO “LAPD management” had to  
12 “summarize [the] Order and disseminate its contents to all officers responding to a protest  
13 in Los Angeles.” I also understood that the TRO required LAPD to comply with Penal  
14 Code sections 13652 and 409.7. Accordingly, I sent the TRO to Sgt. Michelle Smith of  
15 the Office of Constitutional Policing and Policy, and directed her to draft a notice on  
16 behalf of the Office of the Chief of Police (“OCOP”) summarizing the terms of the TRO.  
17 Sgt. Smith relied on the TRO and Exhibit A to draft the notice. In the afternoon on July  
18 11, Sgt. Smith had completed a first draft of the notice, and sent it to Mr. De La Guerra to  
19 obtain additional feedback. I understand that, throughout July 11, Mr. De La Guerra  
20 discussed the draft notice with members of his office, who suggested and made revisions.  
21 On Saturday, July 12, Chief Jim McDonnell approved an iteration of the notice. On July  
22 12 and on Sunday, July 13, iterations of the notice continued to be discussed and revised.  
23 On the late afternoon of Monday, July 14, I received a final version of the notice, which I  
24 understood incorporated revisions to address the concerns of the plaintiffs’ attorneys. On  
25 the morning of Tuesday, July 15, I arranged for Chief McDonnell to sign the notice. I  
26 further arranged for the notice to be posted on LAPD’s Local Area Network (“LAN”) on  
27 July 15, which I further discuss below. Attached as **Exhibit C** is a true and correct copy

1 of the notice issued by the Office of Chief of Police to all department personnel on July  
2 15, 2025.

3 7. Exhibit C is entitled “Temporary Restraining Order Regarding Journalists At  
4 Demonstrations and Protests.” Exhibit C states that the purpose of the notice is to  
5 “inform personnel of the Temporary Restraining Order (TRO) issued on July 10, 2025,  
6 by United States District Judge Hernán Vera that prohibits targeting journalists, who are  
7 not posing a threat of imminent harm to an officer or another person, with less-lethal  
8 munitions and other crowd control weapons (including kinetic impact projectiles,  
9 chemical irritants, and flash bangs).” Exhibit C then repeats the language from the  
10 Court’s TRO with respect to Penal Code section 409.7 and provides further guidance on  
11 who qualifies as a journalist. Next, under a heading that states “Reminder Regarding Use  
12 of Kinetic Energy Projectiles And Chemical Agents During Demonstrations,” Exhibit C  
13 repeats the language from the Court’s TRO with respect to Penal Code section 13652.  
14 This section also provides additional language from section 13652 and refers personnel to  
15 Exhibit B “for further guidance on determining media access to closed areas.” Exhibit C  
16 further advises that anyone with questions should contact the Office of Constitutional  
17 Policing and Policy, which drafted the notice.

18 8. All notices from the Office of the Chief of Police, including Exhibit C, are  
19 posted on LAPD’s Local Area Network (“LAN”), an intranet hub which is a standard and  
20 very effective way to disseminate important notices department-wide. All personnel are  
21 expected to review these notices. The LAN is the hub for all of LAPD’s internal  
22 resources and communications, including the Department manual, transfers, promotional  
23 opportunities, fundraisers, retirements, and requests for days off. When Exhibit C was  
24 first posted, it appeared on the LAN’s homepage, but now it is only one-click from the  
25 homepage under the publications tab. Attached as **Exhibit D** is a true and correct notice  
26 from the Office of the Chief of Police dated June 22, 2011, which provides that LAPD’s  
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1 method for distributing notices is to post them on the LAN, rather than distributing paper  
2 copies of them.

3 I declare under penalty of perjury under the laws of the United States of America  
4 that the foregoing is true and correct. Executed this 22<sup>nd</sup> day of August, 2025, in  
5 Ventura, California.

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7 Deputy Chief T. Scott Harrelson  
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